

METERING INSTALLATION EXEMPTION AUTOMATION CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Vector Metering

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Table of Contents

1. Context	3
2. Question on Metering Installation Exemption Automation Effective Date	3
3. Exemption Procedure (Metering Installation Malfunctions)	3
4. Metering Exemption (Small Customer Metering Installation)	7
5. Metering Installation Exemption Guideline (New Document)	10
6. Retail Electricity Market Procedures – Glossary and Framework	Error! Bookmark not defined.

1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the metering installation exemption automation consultation.

2. Question on Metering Installation Exemption Automation Effective Date

Heading	Participant Comments
Do you agree with the 1 November 2023 effective date? If not, why not?	Agreed, if all the issues can be resolved.

3. Exemption Procedure (Metering Installation Malfunctions)

Section	Description	Participant Comments
2.3 AEMO's Determination	<p>Increased AEMO's determination timeframes due to high number of applications received.</p> <p>Added clarification that the new automated exemption process will be two steps process.</p>	<p>2.3(b) currently says "...AEMO must determine whether to approve the application and communicate that determination to the applicant."</p> <ul style="list-style-type: none"> • More detail is required in this clause on how AEMO will communicate its determination. We understand that AEMO believes participants are to continuously monitor the AEMO Exemption Portal to see AEMO's determination and that this fulfils the communication requirements under the solution. If this is the case then we don't agree, we believe AEMO should issue an email to the MC indicating that a exemption has been processed and a determination has been made. This can be used by the MC as a trigger to respond accordingly. i.e. where further information

Section	Description	Participant Comments
		<p>is required the MC is aware and can commence. It is important that this is to be understood as it drives internal processes for MC's.</p>
<p>2.5 Grant of Exemption</p>	<p>Clarified the timing of granting the exemption by AEMO</p>	<p>2.5 An exemption granted by AEMO will commence on the date that AEMO received the application via MSATS and completed supporting documentation (if required) via the email process (whichever the greater). .</p> <ul style="list-style-type: none"> • Date of commencement should be date that exemption was applied for, not when supporting documentation is provided. Unlike the current process where all necessary information is generally provided with the application, this is not the case under the new two-step process. The new process introduces delay before any additional information can be sent. AEMO has 5 business days to provide the Exemption ID before addition info can be emailed. This built-in delay can cause periods of non-compliance with the rules while AEMO make determination. If AEMO makes a favourable determination then the exemption should commence on the date that the exemption application applied for. The date that AEMO made the exemption should be visible for audit processes.
<p>2.7 Extension to Exemption</p>	<p>Deleted reference to Appendix B. Added a new section about AEMO's notification of expiring exemptions and the process of extension.</p>	<p>2.7. Extension to Exemption - "AEMO will notify the current MC up to 14 business days prior to the exemption expiring – "</p> <ul style="list-style-type: none"> • We believe there should be 20 Business days notice of an expiry of an exemption. This is to allow for the process of reapplying to be completed before expiry of exemption, otherwise MC may find themselves in breach of rules for a period of time while AEMO make their determination. This clause also refers to

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		<p>a 'closed status' "...exemption will be updated to a Closed status' which doesn't appear to exist in the exemption life cycle (Appendix A 5.1.4. Exemption Status codes in the Guideline). Maybe it means 'Resolved'? Please clarify if this closed status is correct.</p>
<p>2.8 Current MC's Obligations during the Exemption Period</p>	<p>Updated 2.8(f) to include timeframes for notifying new MC of existing exemptions and clarified the point to align with the automation process.</p>	<ul style="list-style-type: none"> 2.8(b) Within one 1 business day, notify all affected Participants of the grant of the exemption and any extension to the exemption and provide them with a copy of the MP's rectification plan; - There are notification obligations in 2.8 that appear unnecessary given affected parties will receive notification via CATS CR's and details of the exemption will appear in MSATS. We believe these notifications obligations on the MC should be removed or at least acknowledge that the CATS CR's generated by the AEMO's automation meet these requirements. 28(b) also links the provision of the MP's rectification plan with the notification obligation. This will create a cumbersome process for MC who will need to take further steps upon notification of approval by AEMO to then send the rectification plan to all participants. We believe that the key information from the rectification plan that parties are interested in is the date that the malfunction is planned to be resolved by. This will now be available in MSATS. We believe that the provision of the rectification plan should be on request to the MC/MP. This would allow parties who are interested in the details of the rectification plans can receive it while others who aren't, don't. CL2.8(e) Notify AEMO and all affected Participants when the metering installation malfunction has been rectified; - Assuming that the MC will remove the NMI from the 'live' exemption and this will be communicated via the CR5150. This clause

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		<p>should be reworded to acknowledge this and only obligate the MC to update the Exemption portal. Remove or reword to only notify AEMO.</p> <ul style="list-style-type: none"> A suggested improvement: If a meter is replaced at a NMI and the NMI has a meter malfunction exemption should the NMI be automatically 'resolved' from the exemption? Any exemption will have been requested because a) the MC can't do it in the required timeframe, or b) required customer to resolve defect before the meter can be installed. Successful installation of the meter means both of these have been negotiated which means the exemption has been resolved. This will streamline the process. Is this worth consideration?
3.1 Timing	Added new point 3.1(ii) to Timing of rectification/action plan	<ul style="list-style-type: none"> MP rectification plan – the new process requires the MP rectification plan to be provided as a prerequisite to AEMO approving a Malfunction exemption however the rules do not require this. NER 7.8.10 say “If an exemption is provided by AEMO under this clause 7.8.10 then the Metering Provider must provide AEMO with a plan for the rectification of the metering installation.”. This is supported by 3.1.(i). It is unclear why AEMO is requiring this as part of its determination. Please advise. Clause 3.1(ii) should make clear that a MDP rectification plan is not required for a Whole Current meter. (See below)
3.2 Contents	Added a new section on the MDP action plan	<ul style="list-style-type: none"> MDP rectification plan – a MDP rectification plan is not required under the rules therefore we don't agree with its inclusion. The majority of these types of malfunctions exemptions are raised on sites with legacy metering which means the DNSP remains in the metering roles until the meter is exchanged. The contestable MC does not have a relationship with the

Section	Description	Participant Comments
		<p>legacy MDP (DNSP) to require them to provide a rectification plan. We note that MDP's already provide most of the information proposed in the procedure. MDP's are required to provide the substitution method and reason in the NEM12/NEM13 file when it creates the substitute reads. The MDP will not be able to provide any information on the period for which subs will be provided as they do not control the scheduling of the repair. This is the job of the MC and New MP (who is not yet in the role of MP).</p> <ul style="list-style-type: none"> • For these reasons we do not support the inclusion of the MDP rectification plan.

4. Metering Exemption (Small Customer Metering Installation)

Section	Description	Participant Comments
<p>3.4. Timing of Application –</p>		<ul style="list-style-type: none"> • It is our view that current provisions under 3.4 that limit the MC to being able to apply for a Type4a exemption for no communications unless the application is made within 30 business days from the meter installation date is not reflective of the reality of communications issues experienced by the market and is leading to confusion amongst market participants. Meters for which no communications can be established, or have lost communications after installation that cannot be restored, are for all intents and purposes are a Type 4a meter but remain labelled as communication smart meter (e.g. COMMS4D). Because the meter is labelled as Communicating (Meter Installation Type Code) Participant reasonably expect that remote services are available when in fact they are not. Retailers are

Section	Description	Participant Comments
		<p>requesting remote DEEN and REEN's, and other services that cannot be provided. Likewise, Meter Data Providers are being requested by DNSPs and Retailers to provide daily actual meter reads when this data is only collected on a manual read cycle (at least once every 3 months). . If the meter was clearly identified as a non-communicating type4a meter (MRAM) then participants can determine that remote services are not available, and data will be provided on a frequency other than daily.</p> <ul style="list-style-type: none"> • It is not uncommon for communications to be lost at a communicating meter after its commissioning. This often occurs because infrastructure is built around the metering position that block the telco signal. This is common in new multi occupancies. To remedy this the MP needs to attend site to determine the cause of the loss of signal, determine an appropriate solution which often requires the customer to make changes to allow the MP to install additional equipment, for example conduits to allow for extended aerial cables. To arrange this can take many months before communications can be restored. • For newly installed meters it often takes multiple visits to the site and multiple teams before all avenues to establish communications has been exhausted. This often takes longer than the 30 business days currently permitted by the procedure. • There have been instances where the only telco in the area has reconfigured their services causing a loss of signal to NMI's in the local area. This takes some time to identify, usually after all other remedies have been attempted and failed. In these cases, getting the Telco to reverse their changes is not assured and these NMI's may remain without communications for the foreseeable future. • We understand that MC's do have a 'work around' available which would be to simply replace the previously installed smart meter with a new one, thus

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		<p>resetting the date of installation, then apply for the type4a exemption within 30 business days. While this would meet the requirements of the procedures, we believe this is wasteful, would contribute to a higher cost for metering and is an example of regulation creating perverse outcomes.</p>
<p>3.6 Grant of Exemption</p>	<p>Clarified the timing of granting the exemption by AEMO</p>	<ul style="list-style-type: none"> We believe the exemptions data should begin on the date that the application request specifies. <p>Clause (b) Indicates that any exemption would start on the later date of when the supplementary documentation (such as the rectifications plans) is supplied. As the new process is now two step and MC's have to wait until AEMO provides the Exemption ID, which we assume to be up to 5 days to provide (this procedure does not specify how long AEMO has but we assume it will be the same as documented in the Cl. 2.3 of the Exemption Procedure (Metering Installation Malfunctions))</p>
<p>4.2 Application for Exemption if No Change in Circumstances</p>	<p>Updated section to reflect the new automated exemption process</p>	<ul style="list-style-type: none"> Unclear why the MC must notify AEMO when it is the AEMO system that notifies the MC of a change in MC. This is inefficient. AEMO should have a report that provides this. It is also unclear how the New MC will know that a NMI it has been assigned is part of an existing exemption list raised by the old MC. The Guide makes reference to the change of status to MCCHURN but it is unclear if the New MC can view the details of the exemption raised by the old MC. Given the MC has only 5 business days to lodge for a continuation then MC's should be pushed a notification where the exemption exists. Email would do, alternately push the MCCHURN report daily.

5. Metering Installation Exemption Guideline (New Document)

Section	Participant Comments
General Comment	<ul style="list-style-type: none"> Until all the issue raised in the procedures are dealt with it is difficult to finalise this guideline. A further review will be required.
4.4 Creating a new exemption	<p>“3. Substitution Required³: Identifies if meter reads for the NMI will require substitution until the issue resolution and the MDP has been notified.”</p> <ul style="list-style-type: none"> We do not agree this field should be mandatory. The MC raising the Malfunction Exemption request has little information regarding the nature of the malfunction until the new MP has attended site. Where it is raising the exemption request because it cannot get access to the site to resolve the issue within in the time period specified under 7.8.10(a) it will have no idea if subs are required or not. Where the Malfunction is on a legacy meter the DNSP will have alerted the retailer of the malfunction and the retailer will have nominated a new MC and request the MC to arrange for the meter to be exchanged. However the MDP (DNSP) could still be reading the meter. In these cases the details of the impact of any malfunction are not provided to the MC. This clause also references a foot note that points to 7.8.10(d). It is unclear how this rule is related to Sub data.
4.5 Reviewing an exemption	<ul style="list-style-type: none"> It appears that there is a missing status. Assuming the AEMO will not start its review of the exemption application until the supporting documentation described in Appendix B is received, and that this is now a two step process and there could be some time between the creation of the request and the sending of the supporting documentation then there should a status of ‘Waiting for supporting data’ before AEMO can commence its review process. AEMO may then request more information via the ‘more data’ status. This status reflects that AEMO has commenced the review process but requires more information.
4.9 Exemption notifications	<ul style="list-style-type: none"> We do not agree that MC’s should be required to constantly monitor the AEMO portal to check if status changes have been made against Exemption Applications waiting for approval. There <u>must</u> be a process that MC’s are notified when the status of an exemption application changes. This could be achieved by ‘pushing’ reports daily or Email notifications as each application changes state. Relying on MC resources to be constantly reviewing the portal is inefficient and a backward step from what is in place today.

Section	Participant Comments
	<ul style="list-style-type: none"> The last two paragraphs indicate that CR's will be sent to all affected participants when a exemptions change state. This only applies to exemptions created under Exemption Procedure (Metering Installation Malfunctions), not for Type4A exemptions. These paras should be updated to make this clear.
4.11 CSV formats	<ul style="list-style-type: none"> Link to CSV standard er https://portal.prod.nemnet.net.au/help/Content/CSVdataFormat/CSV_Format.htm only works if you are connected to Market Net. Should be publicly available.
Appendix A 5.1.2. Exemption Type Codes	<ul style="list-style-type: none"> 'Shared Fuse' is not a Metering Installation Malfunction so cannot be used as a reason to apply for an exemption under 7.8.10. It should be in the Exemption Nature table under Malfunctions (Family, Defective). There should only be one TYPE4A and that is 'No Comms'. That is the only reason for raising a Small Meter installation Exemption. No Pub/No ALT/Environ should be moved to Exemption Nature.
Other Audit Trail	<ul style="list-style-type: none"> We have some concerns about the availability of reports that can provide a full audit trail of an exemption. This is likely to be required by MC's for their annual MC audits. If MC are to be required to use the portal to administer Exemptions then full audit reports including date/times of changes are required.